INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Best Chairs, Inc. - Dimension Plant
1053 4th Avenue
Jasper, Indiana 47546

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 037-16193-00086	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:April 25, 2003 Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood chair manufacturing source.

Authorized Individual:	President
Source Address:	1053 4th Avenue, Jasper, Indiana 47546
Mailing Address:	One Best Drive, Ferdinand, Indiana 47532
General Source Phone Number:	812-367-1761
SIC Code:	2426
County Location:	Dubois
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

(a) One (1) combination airless spray and dip surface coating booth, identified as B-1, constructed in 1994, equipped with dry filters for overspray control, exhausted to Stack B-1, capacity: 697 pieces of wood per hour.

(b) One (1) rough cut woodworking area, identified as RC-1, equipped with a baghouse for PM control, identified as PN-1, exhausted to Stack PN-1, constructed in 1994, capacity: 16,381 pounds of wood per hour.

(c) One (1) rough cut woodworking area, identified as RC-2, equipped with a baghouse for PM control, identified as TD-2, exhausted to Stack TD-2, capacity: 21,420 pounds of wood per hour.

(d) One (1) finished cut woodworking area, identified as FC-1, equipped with a baghouse for PM control, identified as NF-1, exhausted to Stack NF-1, constructed in 1994, capacity: 23,301 pounds of wood per hour.

(e) One (1) finished cut woodworking area, identified as FC-2, consisting of wood sanders, shapers, buffers, a CNC machine and boring machines, equipped with a baghouse for PM control, identified as TD-3, exhausted to Stack TD-3, capacity: 6,448 pounds of wood per hour.

(f) One (1) saw dust handling area, known as SH-1, equipped with a baghouse for PM control, identified as TD-1, exhausted to Stack TD-1, constructed in 1997, capacity: 18,949 pounds of wood per hour.

(g) One (1) #2 fuel oil-fired boiler, rated at five (5.0) million British thermal units per hour, identified as B150, constructed in 1978, exhausted to Stack B150.

(h) One (1) wood waste-fired boiler, rated at ten (10.0) million British thermal units per hour, identified as B300, constructed in 1986, equipped with a mechanical flyash collector without flyash reinjection, exhausted to Stack B300.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Closed loop heating and cooling systems.

(c) Paved and unpaved roads and parking lots with public access.

(d) Four (4) drying kilns, identified as KA, KB, KC and KD, heated by steam from the wood waste boiler B300.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted

by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Southwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Southwest Regional Office: 812-436-2570, facsimile 812-436-2572

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in

the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating

(a) One (1) combination airless spray and dip surface coating booth, identified as B-1, constructed in 1994, equipped with dry filters for overspray control, exhausted to Stack B-1, capacity: 697 pieces of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one (1) of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 HAPs Limitations [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators in the combination airless spray and dip surface coating booth, identified as B-1, shall be limited to less than a total of ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The combination of HAPs delivered to the coating applicators in the combination airless spray and dip surface coating booth, identified as B-1, shall not exceed a total of twenty-two and nine tenths (22.9) tons per twelve (12) consecutive month period tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 PM_{10} [326 IAC 2-8-4] [326 IAC 2-2]

The PM_{10} overspray emissions from the combination airless spray and dip surface coating booth, identified as B-1, shall not exceed 0.308 pounds per hour which represents the unrestricted potential to emit for the combination airless spray and dip surface coating booth. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply and no record keeping or reporting is required.

D.1.4 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The potential to emit PM from the combination airless spray and dip surface coating booth, identified as B-1, shall not exceed 1.03 pounds per hour. Compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the combination airless spray and dip surface coating booth, identified as B-1, exhausted to Stack B-1, shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the combination airless spray and dip surface coating booth and any control devices.

Compliance Determination Requirements

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control shall be in place and control emissions from the combination airless spray and dip surface coating booth at all times that the facilities are in operation.

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack B-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.2.

(1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total single and combination of HAPs usage for each month; and

(4) The weight of single and combination HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Woodworking Operations

(b) One (1) rough cut woodworking area, identified as RC-1, equipped with a baghouse for PM control, identified as PN-1, exhausted to Stack PN-1, constructed in 1994, capacity: 16,381 pounds of wood per hour.

(c) One (1) rough cut woodworking area, identified as RC-2, equipped with a baghouse for PM control, identified as TD-2, exhausted to Stack TD-2, capacity: 21,420 pounds of wood per hour.

(d) One (1) finished cut woodworking area, identified as FC-1, equipped with a baghouse for PM control, identified as NF-1, exhausted to Stack NF-1, constructed in 1994, capacity: 23,301 pounds of wood per hour.

(e) One (1) finished cut woodworking area, identified as FC-2, consisting of wood sanders, shapers, buffers, a CNC machine and boring machines, equipped with a baghouse for PM control, identified as TD-3, exhausted to Stack TD-3, capacity: 6,448 pounds of wood per hour.

(f) One (1) saw dust handling area, identified as SH-1, equipped with a baghouse for PM control, identified as TD-1, exhausted to Stack TD-1, constructed in 1997, capacity: 18,949 pounds of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking and saw dust handling areas, exhausted to Stacks PN-1, TD-2, NF-1, TD-3 and TD-1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 PM_{10} [326 IAC 2-8-4] [326 IAC 2-2]

The PM_{10} emissions shall not exceed:

(a) 3.95 pounds per hour for the rough cut woodworking area, identified as RC-1;

(b) 4.00 pounds per hour for the rough cut woodworking area, identified as RC-2;

(c) 4.59 pounds per hour for the finished cut woodworking area, identified as FC-1;

(d) 4.00 pounds per hour for the finished cut woodworking area, identified as FC-2; and

(e) 1.77 pounds per hour for the saw dust handling area, identified as SH-1.

Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply and no record keeping or reporting is required.

D.2.3 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The PM emissions shall not exceed:

(a) 14.4 pounds per hour for the rough cut woodworking area, identified as RC-1;

(b) 7.72 pounds per hour for the rough cut woodworking area, identified as RC-2;

(c) 14.5 pounds per hour for the finished cut woodworking area, identified as FC-1;

(d) 7.72 pounds per hour for the finished cut woodworking area, identified as FC-2; and

(e) 6.47 pounds per hour for the saw dust handling area, identified as SH-1.

Compliance with these limits makes 326 IAC 2-2 and 40 CFR 52.21 not applicable and no record keeping or reporting is required.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.5 Particulate Control

In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the baghouses for particulate control shall be in operation and control emissions from the woodworking and saw dust handling areas at all times that the facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack exhausts PN-1, TD-2, NF-1, TD-3 and TD-1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking and saw dust handling areas when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts PN-1, TD-2, NF-1, TD-3 and TD-1.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Boilers

(g) One (1) #2 fuel oil-fired boiler, rated at five (5.0) million British thermal units per hour, identified as B150, constructed in 1978, exhausted to Stack B150.

(h) One (1) wood waste-fired boiler, rated at ten (10.0) million British thermal units per hour, identified as B300, constructed in 1986, equipped with a mechanical flyash collector without flyash reinjection, exhausted to Stack B300.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1]

(a) Pursuant to 326 IAC 6-1-2(b) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the #2 fuel oil-fired boiler, identified as B150, shall be limited to 0.15 pounds per million British thermal units heat input, and

(b) Pursuant to 326 IAC 6-1-2(b) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the wood waste-fired boiler, identified as B300, shall be limited to 0.60 pounds per million British thermal units heat input.

D.3.2 PM_{10} [326 IAC 2-8-4] [326 IAC 2-2]

The PM_{10} emissions shall not exceed:

(a) 0.071 pounds per hour for the #2 fuel oil-fired boiler, identified as B150, and

(b) 2.88 pounds per hour for the wood waste-fired boiler, identified as B300.

Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 do not apply and no record keeping or reporting is required.

D.3.3 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The PM emissions shall not exceed:

(a) 0.071 pounds per hour for the #2 fuel oil-fired boiler, identified as B150, and

(b) 4.00 pounds per hour for the wood waste-fired boiler, identified as B300.

Compliance with these limits makes 326 IAC 2-2 and 40 CFR 52.21 not applicable and no record keeping or reporting is required.

D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

(a) Visible emission notations of the boiler stack exhausts B150 and B300 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the boiler stack exhausts B150 and B300 once per shift.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(f) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1 (Nonattainment Area Limitations), the allowable PM emission rate from the grinding and machining operations shall not exceed a grain loading of 0.03 grains per dry standard cubic foot of exhaust air.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Best Chairs, Inc. - Dimension Plant
Source Address: 1053 4th Avenue, Jasper, Indiana 47546
Mailing Address: One Best Drive, Ferdinand, Indiana 47532
FESOP No.: F 037-16193-00086

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Best Chairs, Inc. - Dimension Plant
Source Address: 1053 4th Avenue, Jasper, Indiana 47546
Mailing Address: One Best Drive, Ferdinand, Indiana 47532
FESOP No.: F 037-16193-00086

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Best Chairs, Inc. - Dimension Plant
Source Address: 1053 4th Avenue, Jasper, Indiana 47546
Mailing Address: One Best Drive, Ferdinand, Indiana 47532
FESOP No.: F 037-16193-00086
Facility: Combination airless spray and dip surface coating booth, identified as B-1
Parameter: Single worst case HAP
Limit: Shall be limited to less than a total of ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Best Chairs, Inc. - Dimension Plant
Source Address: 1053 4th Avenue, Jasper, Indiana 47546
Mailing Address: One Best Drive, Ferdinand, Indiana 47532
FESOP No.: F 037-16193-00086
Facility: Combination airless spray and dip surface coating booth, identified as B-1
Parameter: Combination of HAPs
Limit: Shall not exceed a total of twenty-two and nine tenths (22.9) tons per twelve (12) consecutive month period tons per twelve (12) consecutive month period.

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Best Chairs, Inc. - Dimension Plant
Source Address: 1053 4th Avenue, Jasper, Indiana 47546
Mailing Address: One Best Drive, Ferdinand, Indiana 47532
FESOP No.: F 037-16193-00086

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: ______________________

Form Completed By: ______________________________________

Title/Position: ______________________________________

Date: ______________________________________

Phone: ______________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: **Best Chairs, Inc. - Dimension Plant**
Source Location: **1053 4th Avenue, Jasper, Indiana 47546**
County: **Dubois**
FESOP: **F 037-16193-00086**
SIC Code: **2426**
Permit Reviewer: **Frank P. Castelli**

On February 26, 2003, the Office of Air Quality (OAQ) had a notice published in the Herald, Jasper, Indiana, stating that Best Chairs, Inc. - Dimension Plant had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a wood chair manufacturing source. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

Since the dry filters are "in place" as opposed to "in operation", Condition D.1.8 has been revised as follows:

D.1.8 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control shall be in **place** ~~operation~~ and control emissions from the combination airless spray and dip surface coating booth at all times that the facilities are in operation.

Change 2:

Condition C.1(a)(1) has been revised as follows to remove the reference to 326 IAC 2-3(Emission Offset) because the area in which the source is located is no longer classified as non-attainment.

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period~~. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable~~;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Change 3:

The single HAP limit in Condition D.1.2(a) has been revised to less than ten (10) tons per twelve (12) consecutive month period since allowing exactly ten (10) tons per year would make the requirements of 326 IAC 2-7 applicable. The revised condition and the revised report form are as follows:

D.1.2 HAPs Limitations [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators in the combination airless spray and dip surface coating booth, identified as B-1, shall **be limited to less than** ~~not exceed~~ a total of ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

FESOP Quarterly Report

Source Name:	Best Chairs, Inc. - Dimension Plant
Source Address:	1053 4th Avenue, Jasper, Indiana 47546
Mailing Address:	One Best Drive, Ferdinand, Indiana 47532
FESOP No.:	F 037-16193-00086
Facility:	Combination airless spray and dip surface coating booth, identified as B-1
Parameter:	Single worst case HAP
Limit:	Shall **be limited to less than** ~~not exceed~~ a total of ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Change 4:

Condition D.4.1 has been revised to cite the applicability of 326 IAC 6-1 instead of 326 IAC 6-3-2. The entire source, including the insignificant activities, is subject to the requirements of 326 IAC 6-1 and as such is exempt from the requirements of 326 IAC 6-3-2. The revision is as follows:

D.4.1 ~~Particulate [326 IAC 6-3-2]~~ **Particulate Matter (PM) [326 IAC 6-1]**

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grinding and machining operations shall not exceed the pounds per hour limitation calculated using the following equations:~~

~~Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.67}$~~ ~~where E = rate of emission in pounds per hour; and~~
~~P = process weight rate in tons per hour~~

~~or~~

~~Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:~~

~~$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and~~
~~P = process weight rate in tons per hour~~

Pursuant to 326 IAC 6-1 (Nonattainment Area Limitations), the allowable PM emission rate from the grinding and machining operations shall not exceed a grain loading of 0.03 grains per dry standard cubic foot of exhaust air.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**Best Chairs, Inc. - Dimension Plant**
Source Location:	**1053 4th Avenue, Jasper, Indiana 47546**
County:	**Dubois**
SIC Code:	**2426**
Operation Permit No.:	**F 037-16193-00086**
Permit Reviewer:	**Frank P. Castelli**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Best Chairs, Inc. relating to the operation of a wood chair manufacturing source. Best Chairs, Inc. was issued FESOP 037-7892-00086, on April 13, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) combination airless spray and dip surface coating booth, identified as B-1, constructed in 1994, equipped with dry filters for overspray control, exhausted to Stack B-1, capacity: 697 pieces of wood per hour.

(b) One (1) rough cut woodworking area, identified as RC-1, equipped with a baghouse for PM control, identified as PN-1, exhausted to Stack PN-1, constructed in 1994, capacity: 16,381 pounds of wood per hour.

(c) One (1) rough cut woodworking area, identified as RC-2, equipped with a baghouse for PM control, identified as TD-2, exhausted to Stack TD-2, capacity: 21,420 pounds of wood per hour.

(d) One (1) finished cut woodworking area, identified as FC-1, equipped with a baghouse for PM control, identified as NF-1, exhausted to Stack NF-1, constructed in 1994, capacity: 23,301 pounds of wood per hour.

(e) One (1) finished cut woodworking area, identified as FC-2, consisting of wood sanders, shapers, buffers, a CNC machine and boring machines, equipped with a baghouse for PM control, identified as TD-3, exhausted to Stack TD-3, capacity: 6,448 pounds of wood per hour.

(f) One (1) saw dust handling area, identified as SH-1, equipped with a baghouse for PM control, identified as TD-1, exhausted to Stack TD-1, constructed in 1997, capacity: 18,949 pounds of wood per hour.

(g) One (1) #2 fuel oil-fired boiler, rated at five (5.0) million British thermal units per hour, identified as B150, constructed in 1978, exhausted to Stack B150.

(h) One (1) wood waste-fired boiler, rated at ten (10.0) million British thermal units per hour, identified as B300, constructed in 1986, equipped with a mechanical flyash collector without flyash reinjection, exhausted to Stack B300.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(b) Closed loop heating and cooling systems.

(c) Paved and unpaved roads and parking lots with public access.

(d) Four (4) drying kilns, identified as KA, KB, KC and KD, heated by steam from the wood waste boiler B300.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Existing Approvals

This source has been operating under the following approvals:

(a) Exemption EQ 037-9567-00086, issued on March 26, 1998;

(b) FESOP F 037-7892-00086, issued on April 13, 1998; and

(c) First Minor Modification MMF 037-9459-00086, issued on August 31, 1998.

The exemption, EQ 037-9567, was issued for the addition of rough cut RC-2 and finish cut FC-2 which was later incorporated into the First Minor Modification MMF 037-9459-00086. In addition, and EQ 037-9459 was also incorporated into the First Minor Modification.

The following terms and conditions from previous approvals have been revised in this permit:

The PM, PM_{10} and HAPs emission limits have been revised to assure compliance with 326 IAC 2-8-4 and make the requirements of 326 IAC 2-2 not applicable to this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on July 10, 2002.

Emission Calculations

See Appendix A, pages 1 though 9 of 9, for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	**Unrestricted Potential Emissions** (tons/year)
PM	4,107
PM_{10}	4,106
SO_2	8.32
VOC	67.4
CO	28.1
NO_X	25.6

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Unrestricted Potential Emissions** (tons/year)
Toluene	34.0
Cobalt Compound	0.069
Methanol	29.9
Arsenic	0.001

HAPs	Unrestricted Potential Emissions (tons/year)
Beryllium	0.00007
Cadmium	0.00007
Chromium	0.001
Lead	0.002
Mercury	0.00007
Nickel	0.001
Selenium	0.0003
Acrolein	0.175
Acetaldehyde	0.036
Benzene	0.184
Formaldehyde	0.193
Hydrogen Chloride	0.832
Styrene	0.0832
Manganese	0.070
Other Insignificant Activities	0.500
TOTAL	66.0

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on April 13, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has constructed

new emission units, the source's potential to emit is based on the emission units included in the original FESOP 037-7892-00086; issued on April 13, 1998 and the emission units permitted by the first minor modification, 037-9459-00086, issued on August 31, 1998.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Surface Coating (B-1)	4.51	1.35	-	64.7	-	-	Less Than 22.9
Woodworking (RC-1)	63.2	17.3	-	-	-	-	-
Woodworking (RC-2)	33.8	17.5	-	-	-	-	-
Woodworking (FC-1)	63.5	20.1	-	-	-	-	-
Woodworking (FC-2)	33.8	17.5	-	-	-	-	-
Woodworking (SH-1)	28.3	7.75	-	-	-	-	-
Fuel Oil Combustion (B150)	0.313	0.313	6.22	0.031	0.782	3.13	0.001
Wood Waste Combustion (B300)	17.5	12.6	1.10	1.71	26.3	21.5	1.58
Insignificant Activities	5.0	5.0	1.0	1.0	1.0	1.0	0.5
Total PTE After Issuance	249.9	99.5	8.32	67.4	28.1	25.6	Single Less Than 10 Total Less Than 25

The potential to emit PM from surface coating (B-1), wood working (FC-1) and the fuel oil and wood combustion are the unrestricted, before control, potential to emit PM. The potential to emit PM from boiler (B300) complies with 326 IAC 6-1 without controls. The potential to emit PM from the woodworking facilities RC-1, RC-2, FC-2 and SH-1 has been proportioned upwards to the balance of (250 - 90.8 tons per year) or 159.2 tons per year to retain the source's minor PSD status pursuant to 326 IAC 2-2 and 40CFR 52.21.

The potential to emit PM_{10} from surface coating, wood waste combustion, RC-2 and FC-2 reflects the after control potential to emit. The potential to emit PM_{10} from the fuel oil combustion represents the uncontrolled potential to emit PM_{10}. The potential to emit PM_{10} from RC-1, FC-1 and SH-1 have been proportionately reduced from the uncontrolled potential to emit such that the sum of the potential to emit PM_{10} for all emission units, including insignificant activities, is less than one hundred (100) tons per year. The potential to emit PM_{10} is being limited to comply with the

requirements of 326 IAC 2-8-4. Compliance with these PM_{10} emission limits also keeps the source a minor PSD source pursuant to 326 IAC 2-2 and 40CFR 52.21.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.

(b) Dubois County has been classified as attainment for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) The one (1) wood waste-fired boiler, rated at ten (10.0) million British thermal units per hour, identified as B300, constructed in 1986 is not subject to New Source Performance Standards (NSPS) Subpart Dc since it was constructed prior to the June 9, 1989 applicability date of this subpart. It is also not subject to the requirements of New Source Performance Standards (NSPS) Subpart Db since its heat input capacity is less than 100 million British thermal units per hour.

(b) One (1) #2 fuel oil-fired boiler, rated at five (5.0) million British thermal units per hour, identified as B150, constructed in 1978, is not subject to New Source Performance Standards (NSPS) Subparts Da or Db because its heat input capacity is less than 250 or 100 million British thermal units per hour.

(c) This wood chair manufacturing source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart JJ because this source is not a major source as defined by 40 CFR Part 63.2. The source will limit HAPs usage at the one (1) surface coating booth, identified as B1, to less than ten (10) tons per twelve (12) consecutive months of any single HAP, including coatings, dilution solvents, and cleaning solvents, and less than twenty-five (25) per twelve (12) consecutive months of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents. Therefore, the emission limitations listed in 40 CFR Part 63, Subpart JJ are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not one of the twenty eight (28) major source categories. The potential to emit of all the criteria pollutants, except PM, are limited to or are less than one hundred (100) tons per year. PM emissions are limited to less than two hundred and fifty (250) tons per year. Therefore, this source is considered a minor source pursuant to 326 IAC 2-2 and 40CFR 52.21.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the potential to emit VOC and PM_{10} is limited to less than one hundred (100) tons per year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment Area Limitations)

Since the source is not a listed source in 326 IAC 6-1-9, the following apply:

(a) Pursuant to 326 IAC 6-1-2(a), facilities located at sources with a total potential to emit PM of greater than one hundred (100) tons per year are limited to a grain loading of 0.03 grains per dry standard cubic foot of outlet air. The two (2) rough cut woodworking operations, identified as RC-1 and RC-2, the one (1) finished cut woodworking operation, identified as FC-2, and the one (1) saw dust handling area identified as SH-1, have a total potential to emit PM of greater than one hundred (100) tons per year and therefore the source is subject to the requirements of 326 IAC 6-1. The woodworking facilities comply with this rule through the use of five (5) baghouses as control devices as shown on pages 7 and 8 of 9 of Appendix A.

(b) The surface coating operation exhausting through stack B-1 is subject to the requirements of 326 IAC 6-1-2(a). The surface coating operation complies with this rule since the ex-

haust air flow rate of 17,600 cubic feet per minute coupled with the 0.03 grain loading yields an allowable PM emission rate of 4.52 pounds per hour. This hourly PM emission rate of 4.52 pounds per hour is greater than the potential to emit PM of 0.308 pounds per hour after controls.

(c) Pursuant to 326 IAC 6-1-2(b)(1)(C), the wood-fired boiler rated at 10 million British thermal units per hour shall not exceed a PM emission rate of 0.6 pounds per million British thermal units heat input. Page 5 of 9 demonstrates that the boiler when combusting wood waste complies with this rule.

(d) Pursuant to 326 IAC 6-1-2(b)(2), the oil-fired boiler rated at 5 million British thermal units per hour shall not exceed a PM emission rate of 0.15 pounds per million British thermal units heat input. Page 3 of 9 demonstrates that the boiler when combusting fuel oil complies with this rule.

326 IAC 7-1.1 (Sulfur Dioxide Limitations)

Since neither boiler has the potential to emit sulfur dioxide in excess of twenty-five (25) tons per year or ten (10) pounds per hour, the requirements of this rule are not applicable.

326 IAC 8-2-12 (Wood Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The one (1) combination airless spray and dip surface coating booth used to coat wood at this source complies with this rule.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grinding and machining operations shall not exceed the pounds per hour limitation calculated using the following equations:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Testing Requirements

Stack testing was not required by the original FESOP nor was it required by the First Minor Modification MMF 037-9459-00086, issued on August 31, 1998. In addition the controlled potential to emit PM and PM_{10} from the woodworking operations, with the stated reasonable baghouse control efficiencies, are well under the limits required by 326 IAC 2-8-4 and 326 IAC 6-1 as shown on page 9 of 9 of Appendix A. Therefore testing is not required for the woodworking operations.

All VOC and HAPs emissions are based on the MSDSs and the boiler calculations used the standard US EPA AP-42 emission factors. Therefore testing is also not required for the surface coating operation and the two (2) boilers.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The one (1) combination airless spray and dip coating surface coating booth has the following compliance monitoring requirements:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (B1) while the booth exhausting to that stack is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(b) The woodworking areas have applicable compliance monitoring conditions as specified below:

(1) Daily visible emissions notations of the baghouse stack exhausts PN-1, TD-2, NF-1, TD-3 and TD-1 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(3) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of

this permit.

(B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(c) The two (2) boilers have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the boiler stack exhausts B150 and B300 shall be performed during normal daylight operations once per shift. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this wood chair manufacturing source shall be subject to the conditions of the attached proposed FESOP Renewal No.: F 037-16193-00086.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Best Chairs, Inc. - Dimension Plant
Address City IN Zip: 1053 4th Avenue Jasper, IN 47546
FESOP: F037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Slow Stain Reducer	6.54	100%	0.00%	100%	0.00%	0.00%	0.00324	697	6.54	6.54	14.8	354	64.7	0.00	N/A	75.0%
Black Dip S2275	7.07	91.3%	0.00%	91.3%	0.00%	7.30%	0.00324	697	6.45	6.45	14.6	350	63.8	0.00	88.4	100%
Tinted OS1752	7.02	74.0%	0.00%	74.0%	0.00%	20.8%	0.00324	697	5.19	5.19	11.7	282	51.4	4.51	25.0	75.0%

					Worst Case Emissions			
		PM	Control Efficiency	70.0%				
State Potential Emissions	**Add worst case coating to all solvents**		**Uncontrolled**		**14.8**	**354**	**64.7**	**4.51**
			Controlled		**14.8**	**354**	**64.7**	**1.35**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Best Chairs, Inc. - Dimension Plant
Address City IN Zip: 1053 4th Avenue Jasper, IN 47546
FESOP: F037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Cobalt Cmpd	Weight % Methanol	Toluene Emissions (tons/yr)	Cmpd. Emissions (tons/yr)	Methanol Emissions (tons/yr)
Worst Case Materials									
Slow Stain Reducer T502	6.54	0.00324	697	1.00%	0.00%	0.00%	0.647	0.00	0.00
Black Dip S2275	7.07	0.00324	697	48.6%	0.00%	42.7%	34.0	0.00	29.9
Tinted OS1752	7.02	0.00324	697	0.00%	0.100%	0.00%	0.00	0.0694	0.00
				Worst Case		**Individual Total**	**34.0**	**0.0694**	**29.9**
						Overall Total	**63.9**		

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Best Chairs, Inc. - Dimension Plant
Address, City IN Zip: 1053 4th Avenue, Jasper, IN 47546
FESOP: F037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
5.00	313	0.280

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.00	39.8 *(142.0S)*	20.0	0.200	5.00
Potential Emission in tons/yr	0.313	6.22	3.13	0.0313	0.782

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

See page 4 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: **Best Chairs, Inc. - Dimension Plant**
Address, City IN Zip: **1053 4th Avenue, Jasper, IN 47546**
FESOP: **F037-16193**
Plt ID: **037-00086**
Reviewer: **Frank P. Castelli**
Date: **July 10, 2002**

HAPs - Metals

	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	0.000004	0.000003	0.000003	0.000003	0.000009
Potential Emission in tons/yr	0.00009	0.00007	0.00007	0.00007	0.0002

HAPs - Metals (continued)

	Mercury	Manganese	Nickel	Selenium	Total HAPs
Emission Factor in lb/mmBtu	0.000003	0.000006	0.000003	0.00002	
Potential Emission in tons/yr	0.00007	0.00013	0.00007	0.0003	0.001

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emission Calculations
Wood Waste Combustion in Boilers

Company Name: Best Chairs, Inc. - Dimension Plant
Address City IN Zip: 1053 4th Avenue Jasper, IN 47546
FESOP: F 037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

Heat Input Capacity (MMBtu/hr)	Moisture (%)	
10.0	7.00	Wet wood has a moisture content of 20% or more

Fuel Type	Pollutant							
	Uncontrolled Emissions	PM	PM10	SO2	NOx	VOC	CO	Lead
Dry Wood	Uncontrolled Emission Factor in lb/MMBtu	0.400	0.377	0.0250	0.490	0.0390	0.600	0.00005
	Uncontrolled Potential Emissions in tons/yr	17.5	16.5	1.10	21.5	1.71	26.3	0.002
	Controlled Emission Factor in lb/MMBtu	0.300	0.287	0.0250	0.490	0.0390	0.600	0.00005
	Controlled Potential Emissions in tons/yr	13.1	12.6	1.10	21.5	1.71	26.3	0.002

Control = Mechanical Flyash Collector for PM and PM-10.

PM-10 emission factors include the condensible PM emission factor of 0.017 pounds per mmBtu, measured by EPA Method 202 or equivalent

Methodology

AP-42 Heating Value of Dry Wood = 8,000 Btu/lb
Emission Factors from AP-42, Chap. 1.6, March 2002
Emission (tons/yr) = Heat Input Capacity (MMBtu/hr X Emission Factor (lb/MMBtu) X 8,760 hrs/yr X [1 ton/2000 lbs]

Appendix A: Emission Calculations
Wood Waste Combustion in Boilers
HAPs Emissions

Company Name: Best Chairs, Inc. - Dimension Plant
Address City IN Zip: 1053 4th Avenue Jasper, IN 47546
FESOP: F 037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

HAPs - Organics

	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene	Vinyl Chloride	Xylenes
Emission Factor in lb/MMBtu	0.000830	0.004000	0.004200	0.004400	0.019000	0.001900	0.000018	0.000025
Potential Emission in tons/yr	0.036	0.175	0.184	0.193	0.832	0.0832	0.00079	0.00110

HAPs - Metals

	Arsenic	Chromium	Lead	Manganese	Nickel	Total HAPs
Emission Factor in lb/MMBtu	0.000022	0.000021	0.000048	0.001600	0.000033	
Potential Emission in tons/yr	0.0010	0.0009	0.0021	0.0701	0.00145	1.58105

Methodology is the same as page 5.

The eight highest organic HAPs and the five highest metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.6.

Appendix A: Emission Calculations
Woodworking Baghouse Operations

Company Name: Best Chairs, Inc. - Dimension Plant
Address City IN Zip: 1053 4th Avenue Jasper, IN 47546
FESOP: F 037-16193
Plt ID: 037-00086
Reviewer: Frank P. Castelli
Date: July 10, 2002

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Rough Cut RC-1							
Baghouse PN-1	99.0%	0.002	29093	49.9	218	0.499	2.18
Allowable (326 IAC 6-1)	99.0%	0.03	29093			7.48	

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Finished Cut FC-1							
Baghouse NF-1	99.0%	0.0005	33852	14.5	63.5	0.145	0.635
Allowable (326 IAC 6-1)	99.0%	0.03	33852			8.70	

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Saw Dust SH-1							
Baghouse TD-1	99.5%	0.003	13040	67.1	294	0.335	1.47
Allowable (326 IAC 6-1)	99.0%	0.03	13040			3.35	

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Rough Cut RC-2							
Baghouse TD-2	99.0%	0.03	15556	400	1752	4.00	17.5
Allowable (326 IAC 6-1)	99.0%	0.03	15556			4.00	

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Finished Cut FC-2							
Baghouse TD-3	99.0%	0.03	15556	400	1752	4.00	17.5
Allowable (326 IAC 6-1)	99.0%	0.03	15556			4.00	

Totals

Before Controls	After Controls	Allowables
(tons/yr)	(tons/yr)	(lb/hr)
4080	39.3	27.5

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Summary

Potential to Emit Before Controls (tons per year)

	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Surface Coating (B-1)	4.51	4.51	0.00	0.00	64.7	0.00	63.9
Boiler (B150)	0.313	0.313	6.22	3.13	0.031	0.782	0.001
Boiler (B300)	17.5	16.5	1.10	21.5	1.71	26.3	1.58
Woodworking Operations							
RC-1	218	218	0.00	0.00	0.00	0.00	0.00
FC-1	63.5	63.5	0.00	0.00	0.00	0.00	0.00
SH-1	294	294	0.00	0.00	0.00	0.00	0.00
RC-2	1752	1752	0.00	0.00	0.00	0.00	0.00
FC-2	1752	1752	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	1.00	1.00	1.00	1.00	0.50
Total	**4107**	**4106**	**8.32**	**25.6**	**67.4**	**28.1**	**66.0**

Summary **Potential to Emit After Controls (tons per year)**

	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Surface Coating (B-1)	1.35	1.35	0.00	0.00	64.7	0.00	63.9
Boiler (B150)	0.313	0.313	6.22	3.13	0.031	0.782	0.001
Boiler (B300)	13.1	12.6	1.10	21.5	1.71	26.3	1.58
RC-1	2.18	2.18	0.00	0.00	0.00	0.00	0.00
FC-1	0.635	0.635	0.00	0.00	0.00	0.00	0.00
SH-1	1.47	1.47	0.00	0.00	0.00	0.00	0.00
RC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
FC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	1.00	1.00	1.00	1.00	0.50
Total	**59.0**	**58.5**	**8.32**	**25.6**	**67.4**	**28.1**	**66.0**

Summary **Potential to Emit After Controls With Woodworking Set Equal to 0.03 gr/dscf (tons per year)**

	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Surface Coating (B-1)	1.35	1.35	0.00	0.00	64.7	0.00	63.9
Boiler (B150)	0.313	0.313	6.22	3.13	0.031	0.782	0.001
Boiler (B300)	13.1	12.6	1.10	21.5	1.71	26.3	1.58
RC-1	32.8	32.8	0.00	0.00	0.00	0.00	0.00
FC-1	38.1	38.1	0.00	0.00	0.00	0.00	0.00
SH-1	14.7	14.7	0.00	0.00	0.00	0.00	0.00
RC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
FC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	1.00	1.00	1.00	1.00	0.50
Total	**140.3**	**140**	**8.32**	**25.6**	**67.4**	**28.1**	**66.0**
Sum of RC-1, FC-1 & SH-1	85.5414						
Total - (RC-1, FC-1 & SH-1)	54.803						
Limited RC-1, FC-1 & SH-1	45.197						

Summary **Potential to Emit After Controls and Limits (tons per year)**

	PM	PM-10	SO2	NOx	VOC	CO	HAPs
Surface Coating (B-1)	1.35	1.35	0.00	0.00	64.7	0.00	22.9
Boiler (B150)	0.313	0.313	6.22	3.13	0.031	0.782	0.001
Boiler (B300)	13.1	12.6	1.10	21.5	1.71	26.3	1.58
RC-1	17.3	17.3	0.00	0.00	0.00	0.00	0.00
FC-1	20.1	20.1	0.00	0.00	0.00	0.00	0.00
SH-1	7.75	7.75	0.00	0.00	0.00	0.00	0.00
RC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
FC-2	17.5	17.5	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.00	5.00	1.00	1.00	1.00	1.00	0.50
Total	**100.0**	**99.5**	**8.32**	**25.6**	**67.4**	**28.1**	**25.0**